

TCG

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Regulatory Affairs

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June 1, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

RE: CC Docket No. 98-24

Dear Ms. Salas:

Teleport Communications Group Inc. ("TCG") hereby informs the Commission that on May 29, 1998, the undersigned, together with Robert Annunziata, Robert Atkinson, Stephen Farkouh, Peter Kist, Joseph Haines, James O'Brien and Michael Oyster, met with Commissioner Powell and Kyle Dixon. The attached charts were discussed, as were TCG's general OSS needs. Additionally, the need for prompt action in approving the pending merger application between AT&T and TCG was discussed.

The original and one copy of TCG's written presentation are submitted with this letter pursuant to Section 1.1206 (b)(2) of the Commission's Rules, 47 C.F.R. §1.1206(b)(2).

Sincerely,

J. Manning Lee

J. Manning Lee

Enclosure

cc: Kyle Dixon

cc: [signature] *OH*
CE

OSS Access

A Facilities-Based Carrier's View

Stephen C. Farkouh
May 29, 1998
Teleport Communications Group

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ILEC Obligations

■ **Nondiscriminatory Access**

- supporting all modes of competitive entry
- covering all categories of operations
- establishing equal access ("parity")
- providing "a meaningful opportunity to compete"

■ **Sufficient Documentation, Training, and Support**

- supporting the use of ILEC OSS access software
- supporting the implementation of ILEC OSS interfaces

■ **Demonstration of Operational Readiness**

- ease of use
- functional completeness
- ability to meet current and foreseeable demand volumes

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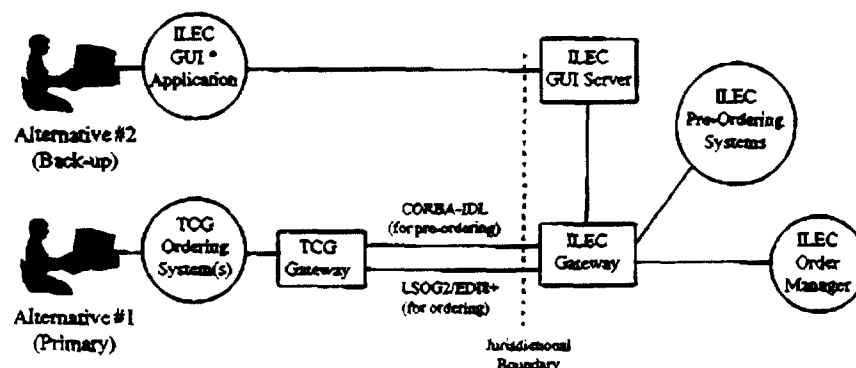
ILEC Falling Well Short of Obligations

- **Needs of Facilities-Based Carriers Require More Attention**
 - UNE OSS Support Lags Well Behind that of Resale
 - Parity in Scope, Accuracy, and Timeliness Not Achieved
 - UNE OSS Access Solutions Preclude Meaningful Competition
- **ILEC UNE OSS Access Solutions are Plagued with:**
 - Inefficiencies and Impracticalities
 - Performance Bottlenecks
 - Functional Deficiencies
- **What's Needed Vastly Differs from What's Offered**

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Example: What's Needed?

Required End-to-End Pre-Ordering/Ordering Process



* Installable for Pre-Ordering Only, Ordering Only, or Integrated Pre-Ordering/Ordering
GUI Graphical User Interface

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Example: What's Offered for Ordering?

- **Functionally Deficient OSS Interfaces**
- **Electronic Interfaces Supplemented with Manual Processes**
 - Customer Service Records Delivered by Mail
 - UNE Order Errors Reported via Telephone
 - Complex UNE Orders Submitted via Fax
- **Ordering Functionality Spread Across Multiple Interfaces**
- **Excessive Manual Intervention**
 - Electronic Feeds to Manual Processes
 - Manual UNE Re-Order Entry
 - Un-integrated Pre-Ordering & Ordering Applications

* Based on an actual ILEC Pre-Ordering and Ordering OSS Access Offering.

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OSS Access Functions & the NMC

- **Trouble Administration**
- **Trouble History Information**
- **Real-time Alarms**
- **Real-time Threshold Crossing Alerts**
- **UNE Testing**
- **Performance Monitoring Data Access/Reporting**
- **Traffic Data (Load/Utilization/Congestion)**
- **Traffic Management Controls (e.g., call gapping)**

NMC Network Management Center

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